

**Jefferson County
District Clerk's Office**
1085 Pearl Street
Room 203
Beaumont, TX 77701
409-835-8580
Fax 409-835-8527



Family Law Division
409-835-8653

Child Support
P. O. Box 3586
Beaumont, TX 77704
409-835-8425

**JAMIE SMITH
District Clerk**

Date: April 29, 2015

| | |
|---------------------|-------------------------------|
| The State of Texas | <u>Clevon Harmanson</u> |
| | • Cause# <u>D-196851</u> |
| County of Jefferson | <u>Phillip M. Ryan, et al</u> |

I, Jamie Smith, Clerk of the District Court, in and for Jefferson County, Texas, do hereby certify that the above and foregoing is a true and correct copy of the entire original case hereof, attached hereto 12 pages, as same was filed and appears of record in my office.

Witness my official seal and signature of office in Beaumont, Texas, this 29th day of April, A.D., 2015.

Jamie Smith, District Clerk
Jefferson County, Texas

By _____
Deputy

A handwritten signature in cursive script, appearing to read "L. Hallway", is written over a horizontal line.

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
3/17/2015 10:46:21 AM
JAMIE SMITH
DISTRICT CLERK
D-196851

NO. _____

CLEVON HARMANSON

VS.

PHILLIP M. RYAN AND CON-WAY
TRUCKLOAD, INC.

§
§
§
§
§

IN THE DISTRICT COURT OF

JEFFERSON COUNTY, TEXAS

____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Clevon Harmanson, hereinafter referred to as Plaintiff, complaining of Phillip M. Ryan and Con-way Truckload, Inc., hereinafter referred to as Defendants, and would respectfully show to the Court as follows:

1. Discovery is intended to be conducted under Level 3, Texas Rules of Civil Procedure, Rule 190.4.

2. Plaintiff is a resident citizen of Jefferson County, Texas.

3. Defendant, Phillip M. Ryan, who, upon information and belief, but subject to independent confirmation, is a resident citizen of Texas.

4. Defendant, Con-way Truckload, Inc. is a foreign corporation organized under the laws of Missouri and authorized to conduct business in the State of Texas and may be served by serving its registered agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

5. This Court has jurisdiction and venue of this case because this cause of action is for negligence and the subject matter of this lawsuit and the amount in controversy are all within the jurisdictional limits of this Court. Further, this Court has venue of this case because all or a substantial portion of the acts or events giving rise to the cause of action and the acts and/or omissions of negligence that proximately caused

(24)

the occurrence in question and the injuries and damages sustained by your Plaintiff occurred within the territorial limits of Jefferson County, State of Texas. Further, Plaintiff, who was at the time of the collision in question, and is currently a resident citizen of the State of Texas. If Defendant Phillip M. Ryan is a resident citizen of the State of Texas, diversity of citizenship does not exist and there is no diversity of citizenship basis or other basis for federal court jurisdiction. The type of lawsuit involved herein is that type of case that is within the jurisdiction of this Court and the amount sought is within the jurisdictional limits of this Court. Therefore, this Court has both jurisdiction and venue to hear and resolve this case.

6. It has become necessary for your Plaintiff to file this cause of action to recover compensatory damages for personal injuries received as a result of a motor vehicle collision that occurred on or about September 19, 2014. At all times material, Defendants, Phillip M. Ryan and Con-way Truckload, Inc., are thought to be the employer(s) and/or owner(s)/operator(s) of the tractor/trailer Defendant, Phillip M. Ryan, was driving at the time and on the occasion in question. Defendant, Phillip M. Ryan, is thought to have been operating said vehicle within the course and scope of his authority, agency and/or employment and within the furtherance of the business affairs of Defendant, Con-way Truckload, Inc. Discovery is at its infancy in this case. Further information and evidence will be obtained concerning the above issues that may possibly require additional or different allegations. Plaintiff reserves the right to amend and/or supplement as allowed by the Texas Rules of Civil Procedure.

7. At the time and on the occasion in question, the Defendant, Phillip M. Ryan, was negligent in the operation of the vehicle he was driving in one or more of the following particulars:

- a) Failure to keep a proper lookout;
- b) Failure to control speed;
- c) Failure to timely apply brakes;
- d) Failure to control his vehicle to avoid a collision;
- e) Failure to prevent his vehicle from traveling backwards and striking Plaintiff's vehicle;
- f) Distracted driving;
- g) Violations of applicable provisions of the Federal and State Federal Motor Carrier Safety Regulations. (negligence per se).

Such acts and/or omissions constitute negligence and such negligence, and negligence per se, proximately caused the occurrence in question and the injuries and damages sustained by your Plaintiff. Discovery is at its infancy in this case. Further information and evidence will be obtained concerning the above issues that may possibly require additional or different allegations. Plaintiff reserves the right to amend and/or supplement as allowed by the Texas Rules of Civil Procedure.

8. Plaintiff also alleges that Defendant, Con-way Truckload, Inc., committed acts and/or omissions of negligent entrustment and/or negligence in providing the means for Phillip M. Ryan to be entrusted and/or provided the motor vehicle in question to an incompetent, unsafe, dangerous or reckless driver, along with violations of the Federal and State Federal Motor Carrier Safety Regulations (negligence per se), such negligence, and

negligence per se, being a proximate cause of the collision and of the injuries and damages suffered by Plaintiffs. Discovery is at its infancy in this case. Further information and evidence will be obtained concerning the above issues that may possibly require additional or different allegations. Plaintiffs reserve the right to amend and/or supplement as allowed by the Texas Rules of Civil Procedure.

9. As a direct and proximate result of the negligence of the Defendants referenced above, your Plaintiff sustained the following damages in the past and, in reasonable probability, will continue to sustain these damages in the future: physical pain, mental anguish, physical impairment, loss of earning capacity and reasonable and necessary medical expenses. Plaintiff, Clevon Harmanson, sues for these damages in an amount within the minimum jurisdictional limits of the Court, over \$1,000,000.00.


10. The Plaintiff also sues for pre-judgment and post-judgment interest on the items of damages allowed by law.

11. Plaintiffs demand a trial by jury on this case.

WHEREFORE PREMISES CONSIDERED, Plaintiff prays that the Defendants be cited in terms of law to appear and answer herein and that upon final hearing Plaintiff does have and recover of, from and against the Defendants, jointly and severally, for their compensatory damages in an amount in excess of the jurisdictional limits of this court, pre- and post-judgment interest, costs of Court, trial by jury and for such other and further relief, in law and in equity to which Plaintiff may show himself justly entitled.

Respectfully submitted,

LAW OFFICE OF GENE S. HAGOOD
1520 E. Highway 6
Alvin, Texas 77511
(281)331-5757
Fax: (281)331-1105
Email: firm@h-nlaw.com

BY: 

GENE S. HAGOOD
SBOT # 08698400
Attorneys for Plaintiff





JAMIE SMITH
JEFFERSON COUNTY DISTRICT CLERK
1085 PEARL STREET, ROOM 203, BEAUMONT, TX 77701

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
3/17/2015 10:46:21 AM
JAMIE SMITH
DISTRICT CLERK
D-196851

REQUEST FOR PROCESS

All sections must be completed for processing this request.

Section 1:

Cause No. _____

Date 03/16/2015

Style:

Clevon Harmanson

VS

Phillip M. Ryan and Con-Way Truckload, Inc.

Section 2:

Check Process Type:

☒ Citation ☐ Precept to Serve / Notice of Hearing/Notice to Show Cause

☐ Temporary Restraining Order

☐ Application for Protective Order / Temporary (Ex Parte) Protective Order

☐ Notice of Registration of Foreign Judgment ☐ Citation by Posting

☐ Writ of _____ ☐ Other _____

☐ Citation by Publication*- Newspaper: _____

☒ Check box if you would like the District Clerk's Office to make copies for your service. (\$1.00 per page per pleading for copies for service)

Section 3:

Title of Document/Pleading to be attached for service: Plaintiff's Original Petition

Note: You must furnish one copy of the document/pleading for each party served.

Section 4: PARTIES TO BE SERVED (Please type or print):

1.Name: Con-Way Truckload c/o Corporation Service Company d/b/a CSC-Lawyers

Address: 211 E. 7th Street, Suite 620

City: Austin

State: TX

Zip: 78701-3218

2.Name: _____

Address: _____

City: _____ State: _____ Zip: _____

(14)

3. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

4. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

5. Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Section 5

Check Service Type:

- | | |
|---|--|
| <input type="checkbox"/> No Service | <input type="checkbox"/> Secretary of State |
| <input type="checkbox"/> Sheriff | <input type="checkbox"/> Commissioner of Insurance |
| <input type="checkbox"/> Constable Pct. | <input type="checkbox"/> Out of County |
| <input type="checkbox"/> Out of State | <input checked="" type="checkbox"/> Private Process <input type="checkbox"/> Other |
| <input type="checkbox"/> Certified Mail | |

Section 6 (ONLY if Section 7 does not apply)

Attorney Name: Gene S. Hagood**Address:** 1520 E. Highway 6

| | | | |
|--------------|-----------------|--------------|--|
| | Street/P.O. Box | | |
| <u>Alvin</u> | <u>TX</u> | <u>77511</u> | |
| City | State | Zip | |

Attorney's Telephone No. 281-331-5757 Attorney's Bar No. 08698400

Section 7 (ONLY if Section 6 does not apply)

Pro-Se Name: _____

Address: _____

| | | |
|-------|-------|-------|
| _____ | _____ | _____ |
| City | State | Zip |

Telephone No. _____

Section 8

Check Delivery Type:

- | | |
|---|--|
| <input type="checkbox"/> Hold for pick up | <input checked="" type="checkbox"/> Mail to Attorney/Attn: Kim Caboche |
|---|--|

CIVIL CASE INFORMATION SHEET

FILED
DISTRICT CLERK OF
JEFFERSON CO TEXAS
3/17/2015 10:46:21 AM
JAMIE SMITH
DISTRICT CLERK

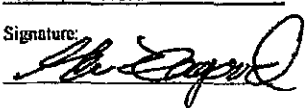
CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

STYLED Clevon Harmanson vs. Phillip M. Ryan and Con-Way Truckload, Inc.
(e.g., John Smith v. All American Insurance Co.; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

3/17/2015 10:46:21 AM
JAMIE SMITH
DISTRICT CLERK

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

| | | | | | | | | | |
|--|--|--|--|--|---|---|---|--|--|
| 1. Contact information for person completing case information sheet: Name: <u>Gene S. Hagood</u> Address: <u>1520 E. Highway 6</u> City/State/Zip: <u>Alvin, TX 77511</u> Signature:  Email: <u>grm@h-nlaw.com</u> Telephone: <u>(281) 331-5757</u> Fax: <u>(281) 331-1105</u> State Bar No: <u>08698400</u> | | Names of parties in case: Plaintiff(s)/Petitioner(s): <u>Clevon Harmanson</u> Defendant(s)/Respondent(s): <u>Phillip M. Ryan</u> <u>Con-Way Truckload, Inc.</u> (Attach additional page as necessary to list all parties) | | Person or entity completing sheet is: <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____ | | | | | |
| 2. Indicate case type, or identify the most important issue in the case (select only 1): | | | | | | | | | |
| Civil <table style="width:100%;"> <tr> <td style="vertical-align: top;"> Contract Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____ </td> <td style="vertical-align: top;"> Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____ </td> <td style="vertical-align: top;"> Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ </td> </tr> </table> | | | Contract Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____ | Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____ | Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ | Family Law <table style="width:100%;"> <tr> <td style="vertical-align: top;"> Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children </td> <td style="vertical-align: top;"> Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order </td> </tr> </table> | | Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children | Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order |
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| Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children | Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order | | | | | | | | |
| <table style="width:100%;"> <tr> <td style="vertical-align: top;"> Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____ </td> <td style="vertical-align: top;"> Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property </td> <td style="vertical-align: top;"> Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____ </td> </tr> </table> | | | Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____ | Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property | Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____ | <table style="width:100%;"> <tr> <td style="vertical-align: top;"> Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____ </td> <td style="vertical-align: top;"> Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Paternity/Parentage <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____ </td> </tr> </table> | | Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____ | Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Paternity/Parentage <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____ |
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| Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax: _____ | | Probate & Mental Health <table style="width:100%;"> <tr> <td style="vertical-align: top;"> Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings </td> <td style="vertical-align: top;"> <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____ </td> </tr> </table> | | | Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings | <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____ | | | |
| Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings | <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____ | | | | | | | | |
| 3. Indicate procedure or remedy, if applicable (may select more than 1): | | | | | | | | | |
| <table style="width:100%;"> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action </td> <td style="vertical-align: top;"> <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment </td> <td style="vertical-align: top;"> <input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover </td> </tr> </table> | | | | | <input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action | <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment | <input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover | | |
| <input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action | <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment | <input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover | | | | | | | |
| 4. Indicate damages sought (do not select if it is a family law case): <input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000 | | | | | | | | | |



RECEIPT FOR: FEES

E-FILING

Cause No: D-0196851 Date: 3/17/15

Receipt No: 308771

Style: CLEVON HARMANSON

vs PHILLIP M RYAN ET AL

Paid By: HAGOOD, GENE S

P

Amt Paid: 298.40 EFILE004524906-0 Bal Due:

| | | | |
|-------|--------------------------|-------|---------------------------|
| 10.00 | RECORDS MANAGEMENT | 10.00 | COURT RECORD PRESERVATIO |
| 10.00 | RECORDS ARCHIVE FEE | 2.00 | ELECTRONIC FILING FEE (\$ |
| 50.00 | COUNTY FILING FEE | 5.00 | COPIES |
| 50.00 | STATE FILING FEE | 30.00 | JURY |
| 10.00 | LIBRARY FEE | | |
| 15.00 | MEDIATION CENTER FEE | | |
| 15.00 | STENO | | |
| 5.00 | SECURITY FEE | | |
| 10.00 | INDIGENT FEE | | |
| 42.00 | JUDICIAL SUPPORT | | |
| 5.00 | APPELLATE JUDICIAL SYSTE | | |
| 20.00 | ELECTRONIC FILING FEE | | |

JAMIE SMITH, CLERK DISTRICT COURTS
Jefferson County, Texas

By: _____

ODBC

Deputy



CITATION

THE STATE OF TEXAS

No. D-0196851

**CLEVON HARMANSON
VS. PHILLIP M RYAN ET AL**

CITATION

**136th JUDICIAL DISTRICT COURT
of JEFFERSON COUNTY, TEXAS**

To: **CON-WAY TRUCKLOAD INC
BY SERVING ITS REGISTERED AGENT
CORPORATION SERVICE CO DBA CSC-LAWYERS INC SRVC CO**

by serving at:
**211 E 7TH STREET
SUITE 620
AUSTIN, TX 78701-3218**

DEFENDANT:

NOTICE:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Said answer may be filed by mailing same to: District Clerk's Office, 1001 Pearl St., 2nd floor, Beaumont, TX 77701, (or if the case is designated as an E-file case, E-file through Lexis Nexis file and serve) or by bringing it to the office. The case is presently pending before the 136th District Court of Jefferson County sitting in Beaumont, Texas, and was filed on the 17th day of March, 2015. It bears cause number D-0196851 and is styled:

Plaintiff:

**CLEVON HARMANSON
VS.
PHILLIP M RYAN ET AL**

Defendant:

The name and address of the attorney for plaintiff (or plaintiff if pro se) is:

**HAGOOD, GENE S, Atty.
1520 EAST HIGHWAY 6
ALVIN, TX 77511 0**

The nature of the demands of said plaintiff is shown by a true and correct copy of Plaintiff's PETITION (PLAINTIFF'S ORIGINAL) ALSO ATTACHED LETTER DESIGNATING ALL CASES EFILE accompanying this citation and made a part thereof.

Issued under my hand and the seal of said court, at Beaumont, Texas, this the 18th day of March, 2015.

JAMIE SMITH, DISTRICT CLERK
JEFFERSON COUNTY, TEXAS

Regan

Regan Corbells

CR

RETURN OF SERVICE

D-0196851

136th JUDICIAL DISTRICT COURT

CLEVON HARMANSON

PHILLIP M RYAN ET AL

Executed when copy was delivered:

This is a true copy of the original citation, was delivered to defendant _____, on the ____ day of _____, 20 ____.

_____, Officer
 _____, County, Texas
 By: _____, Deputy

ADDRESS FOR SERVICE:

CON-WAY TRUCKLOAD INC

BY SERVING ITS REGISTERED AGENT

AUSTIN, TX 78701 3218

OFFICER'S RETURN

Came to hand on the ____ day of _____, 20 ____, at _____, o'clock ____ m., and executed in _____, County, Texas by delivering to each of the within named defendants in person, a true copy of this Citation with the date of delivery endorsed thereon, together with the accompanying copy of the Citation at the following times and places, to-wit:

| Name | Date/Time | Place, Course and Distance from Courthouse |
|-------|-----------|--|
| _____ | _____ | _____ |

And not executed as to the defendant(s), _____

The diligence used in finding said defendant(s) being:

and the cause or failure to execute this process is:

and the information received as to the whereabouts of said defendant(s) being:

FEES:

Serving Petition and Copy \$ _____

Total \$ _____

_____, Officer
 _____, County, Texas

By: _____, Deputy

Affiant

COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign and return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty of perjury and contain the following statement:

"My name is _____, my date of birth is _____, and my address is _____
 (First, Middle, Last)

(Street, City, Zip)

I DECLARE UNDER PENALTY OF PERJURY THAT THE FORGOING IS TRUE AND CORRECT.

Executed in _____, County, State of _____, on the ____ day of _____.

Declarant/Authorized Process Server

(Id # expiration of certification)